



US EPA RECORDS CENTER-REGION 5



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American Cyanamid Company
P O Box 262
Michigan City, IN 46360
(219) 874-6211

June 6, 1983

Mr. Støllsmith
Indiana State Board of Health
1330 West Michigan Street
P.O. Box 1964
Indianapolis, IN 46206-1964

Dear Mr. Støllsmith:

Mr. Richard Cleaton, Indiana State Board of Health, indicated during a visit to the Michigan City Plant of American Cyanamid Company on May 10, 1983, that you desire a summary of our recent injection well activities.

Cyanamid carefully reviewed injection well operations and determined that the waste disposed is not hazardous as defined by 40 CFR 261; the waste was found to be a brine (predominately sodium sulfate) at a concentration similiar to that naturally occurring in the receiving formation.

Geraghty & miller, Inc. of Syosset, New York was employed to research, collect, and present data in order that a valid conclusion could be reached on the viability of our present injection wells. The outcome of this report was that based on the non-hazardous nature of the injected waste, its similiarity to the fluids in the receiving zone, and the hydrogeology, an aquifer exemption should be pursued.

Following the issue of the Geraghty & Miller, Inc. report, American Cyanamid environmental representatives met with the Region V EPA (ground water section) in an attempt to clarify the direction of future, underground injection control regulation and the affect it would have on the American Cyanamid injection wells in Michigan City,

Information resulting from the Region V EPA meeting has lead American Cyanamid to initiate a study with Golden Strata Services, Inc. of Houston, Texas. They will expand on the work started by Geraghty & Miller, Inc.

Pending the outcome of this study (and the reaction of the regulatory authority to the anticipated aquifer exemption petition), there are two possible courses of action. They are as follows:

- (1) Upgrade our present injection wells to Class I status with an aquifer exemption, or,
- (2) Abandon the present injection zone and install new Class I injection wells to a different, deeper receiving zone.

The information presented by Golden Strata Service, Inc. should allow American Cyanamid Company to make a knowledgeable decision on their deepwells by year end.

Yours truly,

AMERICAN CYANAMID COMPANY



R. V. Toloso
Plant Manager

RVT:mm